City of Seattle

Department of Planning and Development
Diane M. Sugimura, Director

CITY OF SEATTLE
ANALYSIS AND DECISION OF THE DIRECTOR OF
THE DEPARTMENT OF PLANNING AND DEVELOPMENT

Application Number: 3004816

Applicant Name: Seattle Pacific University

Address of Proposal: 3309 6th Ave W

SUMMARY OF PROPOSED ACTION

Land Use Application to allow a five-story congregate residence (Irondale Residence Hall) with 150 beds. Parking for 70 vehicles to be provided within the structure. Project also includes 9,815 cu. yds. of grading. An Addendum to Seattle Pacific University Master Plan Environmental Impact Statement was prepared. Four residential structures to be demolished.

The following approval is required:

SEPA - Environmental Determination - Chapter 25.05 SMC

SEPA DETERMINATION: [ ] Exempt [ ] DNS [ ] MDNS [X] EIS

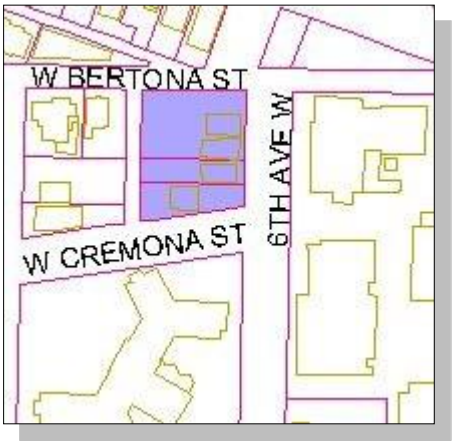
[ ] DNS with conditions

[ ] DNS involving non-exempt grading, or demolition, or involving another agency with jurisdiction

BACKGROUND

Site and Vicinity

The Project occupies the half-block bound by West Bertona Street on the north, 6th Avenue West on the east, West Cremona Street on the south, and Irondale Avenue West (an unimproved, named alley) on the west. The site is also located within the boundaries of the Seattle Pacific University (SPU) Major Institution Overlay (MIO) zone. The site contains four SPU-owned houses, which will be demolished.



The entire development site is zoned MIO with a 37 foot height limit. The development site's underlying zoning is Lowrise-1 (LR1).[1] Only uses associated with this Institution are eligible for the designated MIO height limits. Non-Institution related uses developing on this site would be bound to the underlying height limits of the zones (currently 37 feet, including the sloped roof allowance of five feet and green roof allowance of two feet).

Proposal

The proposed development will be an approximately 69,800 square foot, five-story residence hall with 1-1/2 levels of partially below-grade parking for 69 vehicles and 61 bicycles. The structure would contain 140-150 beds. Open space would be provided in three areas on-site, including a plaza, a terrace, and a roof deck.

Public Comments

Notice of the project was published on June 3, 2010. The required public comment period ended on June 18, 2010. Two comments were received pertaining to SEPA compliance and are addressed in the SEPA section below.

One commenter expressed the belief that the proposal required major amendments to the MIMP because it provides only 68 parking spaces where the MIMP indicated 180. However, inclusion of potential parking in an approved MIMP does not create a regulatory requirement that the parking must be built with no less than the proposed number of spaces. For Major Institutions, parking quantity is regulated on a campus-wide basis under the Land Use Code (SMC 23.54.016) and pursuant to SEPA review. So long as the institution is meeting the minimum parking requirements of the Code and is mitigating potential parking impacts, additional parking is not required. Also, because the MIMP clearly states that the 180 parking spaces at the Irondale site were "potential" parking spaces, MIMP at 27 Fig. 9, the reduction is not a change to the MIMP. After giving careful consideration to the information presented in these comments, the Director concludes that the subject proposal is consistent with the MIMP and does not require a change or an amendment to the MIMP under SMC 23.69.035.

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[1] At the time of application, the underlying zoning was "L-1." On December 20, 2010, however, the Mayor signed Ordinance 123495 consolidating the City's lowrise zones and re-naming the new Lowrise 1 "LR-1." This ordinance took effect on January 19, 2011.

ANALYSIS – STATE ENVIRONMENTAL POLICY ACT (SEPA)

This analysis relies on the Final Environmental Impact Statement ("FEIS") for the Seattle Pacific University Major Institution Master Plan, published September 1999 and the Irondale Addendum to the FEIS, completed June 3, 2010 ("EIS Addendum"), as well as appendices, other technical environmental reports, and comments and responses associated with those documents. This decision also makes reference to and incorporates the project plans submitted with the project application and public comments on the proposal. The information in the FEIS and EIS Addendum, supplemental information provided by the applicant, project plans, and the experience of the lead agency with review of similar projects form the basis for this decision and conditioning.

The Seattle SEPA Ordinance provides authority to require mitigation of adverse impacts resulting from a proposed project (SMC 25.05.655 and 25.06.660). Mitigation, when required, must be related to specific environmental impacts identified in an environmental document and may be imposed to the extent that a given impact is attributable to the proposal, and to the extent that the mitigation is reasonable and capable of being accomplished. Additionally, mitigation may be required only when based on policies, plans and regulations as enunciated in SMC 25.05.665 to SMC 25.05.675 inclusive (SEPA Overview Policy, SEPA Cumulative Impacts Policy, SEPA Specific Environmental Policies). In some instances, local, state or federal regulatory requirements will provide sufficient mitigation of an impact and additional mitigation imposed through SEPA would not be necessary.

The SEPA Overview Policy (SMC 25.05.665 D) clarifies the relationship between codes, policies, and environmental review. Specific policies for each element of the environment, certain neighborhood plans and other policies explicitly referenced may serve as the basis for exercising substantive SEPA authority. The Overview Policy states in part: *"where City regulations have been adopted to address an environmental impact, it shall be presumed that such regulations are adequate to achieve sufficient mitigation"* (subject to some limitations). Under certain limitations/circumstances (SMC 25.05.665 D 1-7) mitigation can be considered. Thus, a more detailed discussion of some of the impacts is appropriate.

The EIS Addendum considered the following environmental impacts: Land Use Patterns (existing conditions); Land Use—relationship to Adopted Plans, Policies and Regulations; Transportation, Circulation and Parking; Housing; Aesthetics; Historic/Cultural Resources; Greenhouse Gas Emissions; and Construction.

Short-Term Impacts

Demolition and construction activities could result in the following temporary or construction-related adverse impacts:

- Decreased air quality due to suspended particulates from building activities and hydrocarbon emissions from construction vehicles and equipment;
- Increased light and glare;
- Increased noise and vibration;
- Increased traffic and demand for parking from construction equipment and personnel; and
- Occasional disruption of adjacent vehicular and pedestrian traffic.

Several adopted codes and/or ordinances provide mitigation for some of the identified impacts: the Noise Ordinance, Stormwater Code, Grading Code, Street Use Ordinance, and Building Code. The Grading Code and Stormwater Code regulate site excavation for foundation purposes and require that soil erosion control techniques be initiated for the duration of construction. The Street Use Ordinance requires debris to be removed from the street right-of-way, and regulates obstruction of the pedestrian right-of-way. Puget Sound Clean Air Agency regulations require control of fugitive dust to protect air quality. The Building Code provides for construction measures in general. Finally, the Noise Ordinance regulates the time and amount of construction noise that is permitted in the city. Compliance with these applicable codes and ordinances will reduce or eliminate most short-term impacts to the environment.

Due to the temporary nature and limited scope of the potential impacts listed above, they are not considered significant (SMC 25.05.794). Although not significant, these impacts are adverse, and in some cases, mitigation is warranted.

Any conditions to be enforced during construction shall be posted at each street abutting the site in a location on the property line that is visible and accessible to the public and to construction personnel from the street right-of-way. The conditions shall be affixed to placards prepared by DPD. The placards will be issued along with the building permit set of plans. The placards shall be laminated with clear plastic or other waterproofing material and shall remain posted on-site for the duration of construction.

Air Quality

Construction associated with the Project would generate air pollutants as a result of fugitive dust from site work and excavation, as well as emissions from construction vehicles. The primary pollutants produced by construction will be particulates and hydrocarbons. No construction activity is expected to cause violations of applicable ambient air quality standards.

In addition, the indirect impact of construction activities including construction worker commutes, truck trips, the operation of construction equipment and machinery, and the manufacture of the construction materials themselves result in increases in carbon dioxide and other greenhouse gas emissions which adversely impact air quality and contribute to climate change and global warming. While these impacts are adverse, they are not expected to be significant due to the relatively minor contribution of greenhouse gas emissions from this project. No potential short term adverse impact to air is anticipated and therefore air quality mitigation is not necessary.

For the removal and disposal of the spoil materials, the Code (SMC 11.74) provides that material hauled in trucks not be spilled during transport. The City requires that a minimum of one foot of "freeboard" (area from level of material to the top of the truck container) be provided in loaded uncovered trucks which minimize the amount of spilled material and dust from the truck bed en route to or from a site.

The Street Use Ordinance requires sweeping or watering streets to suppress dust, on-site washing of truck tires, removal of debris, and regulates obstruction of the pedestrian right-of-way. This ordinance provides adequate mitigation for transportation impacts on air quality; therefore, no additional conditioning is warranted pursuant to SEPA policies.

Construction Traffic & Parking

On-street parking in the vicinity is limited, and the demand for parking by construction workers during construction could exacerbate the demand for on-street parking and result in an adverse impact on surrounding properties. The owner and/or responsible party shall assure that construction vehicles and equipment are parked on the subject site for the term of construction whenever possible.

Estimates indicate that the proposed project would require removal of a total of approximately 10,200 cubic yards of earth. This amount of earthwork is estimated to generate a total of 510 loaded outbound truck trips and 510 empty in-bound truck trips during the duration of excavation activity. While this traffic may at times inconvenience properties adjacent to the site and motorists on streets bordering the project site, these impacts would be temporary and are not expected to produce significant traffic impacts.

The SEPA Overview Policy (SMC 25.05.665) and the SEPA Construction Impacts Policy (SMC 25.05.675B) allow the reviewing agency to mitigate impacts associated with construction activities. Existing City code (SMC 11.62) requires truck activities to use arterial streets to the greatest extent possible. Pursuant to SMC 25.05.675(B) (Construction Impacts Policy) and SMC 25.05.675(R) (Traffic and Transportation), additional mitigation is warranted. SPU shall submit for review and approval a Construction Traffic and Parking Management Plan. A construction truck route should be defined to reduce impacts on the adjacent roadway systems. This plan should also include a safe route along the construction site for pedestrians and bicyclists. The truck route should rely on arterials as much as possible, thereby reducing impacts on surrounding residential neighborhoods.

While some construction-related transportation and parking impacts would be unavoidable, given the short duration of construction and the mitigation above, no significant impacts are expected.

Noise

The FEIS for the MIMP generally addressed construction impacts of potential development, but the EIS Addendum addresses them in more detail, presenting an analysis of noise that would be generated by the proposed development. The construction activities associated with the proposed development will produce noise impacts which could adversely affect the surrounding uses. Major sources of construction-related noise would involve demolition activity associated with the four existing residential structures, site preparation, and excavation for the project. The institutional nature of some of the surrounding uses will help mitigate these impacts; because a number of the neighboring properties most likely to be affected by construction noise are within the MIO and owned and operated by SPU, they are less sensitive to noise impacts than other uses.

To the west and north of the proposed development site, however, are residential structures. Due to the proximity of these uses, the limitations of the Noise Ordinance are found to be inadequate to mitigate the potential noise impacts. Pursuant to the SEPA Overview Policy (SMC.25.05.665) and the SEPA Construction Impacts Policy (SMC 25.05.675B), mitigation is warranted. The EIS Addendum recommends several mitigation measures to address construction noise impacts. Implementation of these measures would adequately mitigate the expected adverse impacts and have been included as necessary in the conditions of approval listed below.

Prior to full enclosure of the buildings, construction activities, other than those taking place within an enclosed building, are limited to the hours of 7:00 AM to 6:00 PM on non-holiday weekdays. Additionally, the use of noise impact-type equipment, such as pavement breakers, pile drivers, jackhammers, sand blasting tools and other impulse noise sources shall be restricted to the hours of 8:00 AM and 5:00 PM on weekdays. Because some occasions may arise where critical construction activities of an emergency nature related to safety or traffic issues may necessitate completion after the regular construction hours mentioned above, DPD may approve waivers of timing restrictions. Such waivers must be requested at least three business days in advance and approved by DPD on a case-by-case basis prior to such work.

After each floor of the building is enclosed with exterior walls and windows, interior construction on the individual enclosed floors can be done at other times in accordance with the Noise Ordinance. Such construction activities will have a minimal impact on adjacent uses. Restricting the ability to conduct these tasks would extend the construction schedule, thus the duration of associated noise impacts.

Whenever appropriate, the contractor shall substitute hydraulic impact tools with electric models to further reduce demolition and construction-related noise and vibration. On-site workers shall limit loud talking, music, or other miscellaneous noise-related activities. Where appropriate, all operating equipment shall be fixed with properly sized and maintained mufflers, engine intake silencers, and where necessary, engine enclosures. Operators shall avoid excessive idling. As necessary, workers shall deploy portable sound barriers around generators, compressors, tieback drill rigs, etc.

Light and Glare

Construction may produce light- and glare-related impacts from both stationary and mobile sources. Stationary sources of light are necessary during times of low light levels to meet safety requirements. While noticeable, these impacts are not expected to be significant provided that construction–related lighting is shielded and directed away from adjacent land uses. Additionally, no significant light and/or glare-related impacts are anticipated in conjunction with mobile sources such as construction vehicles entering or exiting the site. These impacts will not be significant, and no additional mitigation is required.

Long-Term Impacts

The EIS Addendum discussed potential long-term or use-related impacts including: land use, housing, greenhouse gas emissions, aesthetics, historic resources, and increased traffic in the area and increased demand for parking. As discussed below, impacts from some of these are anticipated as a result of approval of this proposal.

Several adopted City codes and/or ordinances provide mitigation for some of the identified impacts. Specifically these are: the Stormwater Code, the Grading Code, and the Energy Code (requiring insulation for outside walls and energy efficient windows). The MIMP and the Land Use Code control site coverage, setbacks, building height, and allowable use and contains other development and use regulations to assure compatible development. Compliance with these applicable codes and ordinances is adequate to achieve sufficient mitigation of most long-term impacts.

Air Quality

Seattle's air quality is adversely affected primarily by vehicular emissions, and the proposed project is expected to have a minimal impact on air quality relative to the existing and projected background traffic. The integration of the proposed development into the campus is unlikely to significantly affect existing levels of vehicular activity around the campus. Current federal and state regulations will likely provide adequate mitigation for impacts on air quality through restrictions on vehicular emissions. No further mitigation pursuant to SEPA authority at SMC Section 25.05.675.A is warranted.

The number of vehicular trips associated with the proposed development is expected to increase from the amount currently generated by the various existing structures and the development's overall electrical energy and natural gas consumption is expected to increase. Together these changes may result in increases in carbon dioxide and other greenhouse gas emissions which adversely impact air quality and contribute to climate change and global warming. While these impacts are adverse, they are not expected to be significant due to the relatively minor contribution of greenhouse gas emissions from this project.

The scale of global climate change is so large that the impacts of a project can only be considered on a "cumulative" basis. It is not anticipated that a single development project would have an individually discernable impact on global climate change. The project's GHG emissions would likely combine with emissions across the City, County, and State and planet to cumulatively contribute to global climate change. The EIS Addendum contains a table with estimated greenhouse gas emissions from the proposed action. EIS Addendum Appendix C.

No significant impacts are anticipated and no additional mitigation is necessary.

Aesthetics

The proposed project complies with the MIO height limit set by the MIO zoning, counting the height bonuses for mansard roofs, parapets, and sloping lots provided in the MIMP development standards. The project has been designed to comply with all MIMP development standards that help determine the bulk and appearance of campus buildings, including structure setbacks, landscaping and modulation. The height of the building will be similar to the nearby campus buildings, but will be higher than most of the residential buildings located to the west and north of the site.

Whereas the west campus boundary in the vicinity of the project site encompasses the entire Irondale Block, because of the scale and nature of existing structures, they do not necessarily appear as University buildings. With the addition of the proposed Irondale Residence Hall, visual setting would have the effect of extending the presence of the campus slightly to the west. The campus setting provides the dominant theme adjacent to the site and the proposed structure will add to these elements. Views of the existing, wood-frame residential structures would be replaced by that of a larger, concrete and wood residence hall. Although the visibility of the structure would increase the physical presence of the University along streets that border the site, the proposed architectural and landscape elements are expected to allow the building to blend well with the existing site and continue the campus setting within the neighborhood.

No significant impacts are anticipated and therefore, no mitigation is necessary.

Historic Preservation

The MIMP EIS identified no known archaeological resources or City-designated landmarks within the MIO. The applicant prepared the *Historic and Cultural Resources Report*, attached as Appendix D to the EIS Addendum, analyzing the historic significance of the four buildings slated for demolition in preparation for the proposed development. All of the buildings were included on the demolition list in the MIMP. None of these residential buildings are significant representations of an architectural style, or associated with historically significant persons, or significant parts of the development of the history of Seattle.

No significant impacts to historic resources are anticipated and no mitigation is necessary.

Transportation & Parking

The FEIS for the MIMP provided an analysis of transportation related impacts associated with the development of the Major Institution Master Plan, and the EIS Addendum provides transportation analysis specific to the impacts of the proposed development. These transportation analyses together evaluate both existing conditions at the time of the report as well as future conditions. A 1% growth rate was used to model future baseline traffic, which is consistent with trends in traffic growth in the study area.

Traffic

According to the EIS Addendum, the proposed development is expected to generate 21 trips in the typical weekday PM Peak hour. The FEIS studied five area intersections, including the signalized intersection of 3rd and Nickerson and the unsignalized intersection of 6th and Nickerson. With the lone exception of southbound movements at the intersection of 6th and Nickerson, which currently operate at LOS F and would continue to do so after project completion, all intersection operations would remain at acceptable levels with little increased delay at most intersections and therefore not significant. No mitigation is required for these impacts.

As part of the 2000 MIMP approval, SPU was required to develop and maintain a Transportation Management Plan ("TMP"). SMC 23.54.016(C)(6) requires review of the TMP when a major institution applies for permits under its MIMP. As a TMP goal, SPU is to achieve a 50% maximum single occupancy vehicle ("SOV") rate, excluding employees whose work requires the use of a private automobile. This TMP was designed to ensure that the number of trips, including PM peak trips, as well as available parking, is within acceptable limits as analyzed in the FEIS. To accomplish this goal, SPU has implemented a number of TMP requirements, including:

- Establishing a Transportation Coordinator to promote and maintain the program, including annual evaluations;
- Providing periodic promotional events supported by King County Metro and the Seattle Department of Transportation;
- Construction of Commuter Information Centers, including ridesharing and transit information;
- Providing Ridematching service coordination
- Review of parking fees and residential parking zones
- Provide online program information
- Subsidize transit passes—100% for employees and 30% for students.
- Subsidize carpool/vanpool and provide preferential parking
- Work with other area employers and community leaders to improve transit service
- Provide covered bicycle parking
- Provide free parking to motorcycles
- Sponsor a guaranteed ride home program for carpool/vanpool participants
- Encourage telecommuting and distance learning opportunities
- Construct sidewalks and pathways and provide safety escorts to encourage walking
- Coordinate with area businesses to promote ridesharing
- Allow for flexible scheduling arrangements for employees

A 2009-2010 update of the TMP efforts was conducted, including a survey of travel modes. The update demonstrates that SPU has come close to meeting the 50% SOV goal; it has achieved a rate of approximately 52%. Since MIMP adoption, SPU has continued efforts to increase the number of on-campus student housing units, which reduces the number of commuting students, including this student housing project. SPU shall continue its efforts to reduce SOV commutes.

Parking

The parking supply is intended to accommodate the on-site demand. SPU research reports that the parking rate for residential students is .45 vehicles per student. The project will add 68 underground parking spaces to accommodate an anticipated student population of 132-150 students, a parking rate range of between .453 and .515 vehicles per student. The Director finds that 68 spaces will accommodate the increase in parking demand associated with the project and no further mitigation is necessary.

Vehicle and Pedestrian Safety

One commenter expressed the opinion that the traffic counts relied upon was out-of-date, inconsistent with field observation, and did not account for an adequate growth in traffic. The concerns are noted. The traffic counts were conducted by a reputable engineering firm in accordance with standard engineering practices and the Director is comfortable relying on the studies. The EIS Addendum notes that the 1% growth rate accurately reflects trends in traffic growth in the study area.

The commenter also stated that the intersection of 3rd and Bertona should have been studied as part of the analysis for project impacts. The trip generation analysis in the EIS Addendum demonstrates that not more than two project-related trips will go through this intersection during the PM Peak. The Director does not feel that such a small number of trips warrant full analysis of the intersection.

The commenter also expressed concerns that the entrance to the new parking garage on 6th Avenue is too close to the intersection of 6th and Bertona. The concern is noted, but due to the low volumes at the intersection of 6th Avenue and Bertona, as well as the low volumes accessing and leaving the garage entrance, the Director concludes that the proximity of the entrance to the intersection is unlikely to produce significant environmental impacts.

Finally, the commenter asks that the City require improvements to the Irondale right-of-way as a condition of approval. The comment is noted, but the Director concludes that no such mitigation is necessary or appropriate. The EIS Addendum identifies no significant impact of this proposal that would be avoided or mitigated by the suggested improvements to the right-of-way.

Environmental Health

With respect to air quality and environmental health impacts, demolition of the existing structures is proposed. The Puget Sound Clean Air Agency has jurisdiction over this impact, but there is no reliable means of triggering their involvement other than by requiring the proponent to notify the agency of the proposal. Hence, project approval has been made contingent upon such notification.

The indirect impact of construction activities including construction worker commutes, truck trips, the operation of construction equipment and machinery, and the manufacture of the construction materials themselves result in increases in carbon dioxide and other greenhouse gas emissions which adversely impact air quality and contribute to climate change and global warming. While these impacts are adverse, they are not expected to be significant due to the relatively minor contribution of greenhouse gas emissions from this project. No potential short-term or long-term, significant adverse impact to air is anticipated and therefore air quality mitigation is not necessary.

DECISION – SEPA

The application is **APPROVED, with conditions** as referenced below.

SEPA - CONDITIONS

Prior to Issuance of any Construction or Grading Permits

The owner(s) and/or responsible party(s) shall:

1. Submit for review and approval a Construction Traffic and Parking Management Plan to the Department of Planning and Development for concurrent review and approval with Seattle Department of Transportation. The plan shall include the following:
    a. Identify management of construction activities including construction hours, parking, shuttle operations, traffic and issues concerning street and sidewalk closures.
    b. Show the location of all parking for construction workers, shuttle pick up areas and parking for related construction equipment, as well as the location of ingress/egress for construction equipment and trucks.
    c. Provide for appropriate and reasonable screening for all construction parking for workers and for construction related equipment.
    d. Direct installation of signage to reinforce truck delivery routes.
    e. Specify a safe route along the construction site for pedestrians and bicyclists.

    These conditions shall be posted at the construction site for the duration of construction activity.

2. A Notice of Intent must be filed with the Puget Sound Clean Air Agency prior to demolition of buildings.

During Construction

The following condition(s) are to be enforced during construction and shall be posted in a location on the property line that is visible and accessible to the public and construction personnel from the street right-of-way. If more than one street abuts the site, conditions will be posted at each street. The conditions will be affixed to placards prepared by DPD. The placards will be issued along with the building permit set of plans. The placards will be laminated with clear plastic or other weatherproofing material and will remain in place for the duration of construction. It is the proponent's responsibility to ensure that the sub-contractors are informed of the conditions listed below:

3. Construction noise and vibration impacts shall be minimized wherever feasible by shielding noisy equipment, avoiding excessive idling, locating equipment away from sensitive receivers, such as residential uses, and adequate muffling of equipment; scheduling particularly noisy operations to avoid conflicts; providing acoustical screens or enclosures where necessary; assembling building components off-site to the greatest extent possible; identifying a 24 hour contact person to receive noise complaints; and coordinating construction mitigation.

4. Wherever feasible, special measures for noise control of unusually loud equipment or activities shall be used during construction. This equipment shall include special mufflers for machine engine exhausts or air powered equipment and acoustical screens or enclosures to be used as needed.

5. The applicant and all contractors shall use the newest equipment reasonably available and shall keep construction equipment in good working condition. In addition, SPU shall reuse demolition materials to the greatest extent possible and take steps to ensure that long periods of construction equipment idling are avoided.

6. The hours of construction activity shall be limited. Construction hours shall be limited to non-holiday weekdays between 7:00 a.m. and 6:00 p.m. Additionally, the use of noise impact-type equipment, such as pavement breakers, pile drivers, jackhammers, sand blasting tools and other impulse noise sources shall be restricted to the hours of 8:00 AM and 5:00 PM on weekdays. This limitation is subject to minor revisions at the discretion of DPD to allow work of an emergency nature, work required due to obstruction of street rights-of-way, and minor, usually interior, work of low noise impact.

7. The applicant shall provide for safe pedestrian and vehicular circulation adjacent to construction sites through the use of temporary walkways, signs, and manual traffic controls (flaggers).

8. Implement the measures in Construction Traffic and Parking Plan approved by DPD and Seattle Department of Transportation (SDOT).

After Project Completion

9. The Applicant shall continue to comply with all of the requirements of the approved MIMP and TMP.

Signature: (signature on file) Date: November 24, 2011
Colin Vasquez, Senior Land Use Planner
Department of Planning and Development
Land Use Services

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